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DISTRICT COURT
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CLERK OF DISTRICT COURT
DISTRICT OF NEVADA

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Attorneys for the Government

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHELE PAONESSA, and
MICHAEL KROGER,

Defendant.

2:13-CR-00232-GMN-VCF

**STIPULATION FOR PROTECTIVE
ORDER**

IT IS HEREBY STIPULATED AND AGREED between the parties,
Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly
Frayn, Assistant United States Attorney, counsel for the United States, Assistant Federal
Public Defender Shari Kaufman, counsel for defendant MICHELE PAONESSA, and
Chris Rasmussen, Esq. counsel for defendant MICHAEL KROGER that this Court issue
an Order protecting from disclosure to the public any discovery documents containing
the personal identifying information such as social security numbers, drivers license

1 numbers, dates of birth, or addresses, of participants, witnesses and victims in this case.
2 Such documents shall be referred to hereinafter as "Protected Documents." The parties
3 state as follows:

4 1. Protected Documents which will be used by the government in its case in
5 chief include personal identifiers, including but not limited to, names, social security
6 numbers, drivers' license numbers, dates of birth, financial account numbers, email
7 addresses, and physical addresses, of participants, witnesses, and victims in this case.

8 2. Discovery in this case is voluminous. Many of the documents include
9 personal identifiers. Redacting the personal identifiers of participants, witnesses, and
10 victims would prevent the timely disclosure of discovery to defendants.

11 3. The United States agrees to provide Protected Documents without
12 redacting the personal identifiers of participants, witnesses, and victims.

13 4. Access to Protected Documents will be restricted to persons authorized by
14 the Court, namely defendant, attorney(s) of record and attorneys' paralegals,
15 investigators, experts, and secretaries employed by the attorney(s) of record and
16 performing on behalf of defendant.

17 5. The following restrictions will be placed on defendant, defendant's
18 attorney(s) and the above-designated individuals unless and until further ordered by the
19 Court. Defendants, defendants' attorneys and the above-designated individuals shall
20 not:
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22 a. make copies for, or allow copies of any kind to be made by any
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1 other person of Protected Documents;

2 b. allow any other person to read Protected Documents; and

3 c. use Protected Documents for any other purpose other than
4 preparing to defend against the charges in the Superseding Indictment or any further
5 superseding indictment arising out of this case.

6 6. Defendant's attorney(s) shall inform any person to whom disclosure may
7 be made pursuant to this order of the existence and terms of this Court's order.

8 7. The requested restrictions shall not restrict the use or introduction as
9 evidence of discovery documents containing personal identifying information such as
10 names, social security numbers, drivers' license numbers, dates of birth, financial
11 account numbers, email addresses, and physical addresses during the trial of this matter.

12 8. Upon conclusion of this action, defendant's attorney(s) shall return to
13 government counsel or destroy and certify to government counsel the destruction of all
14 discovery documents containing personal identifying information such as such as names,
15 social security numbers, drivers' license numbers, dates of birth, financial account
16 numbers, email addresses, and physical addresses within a reasonable time, not to
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1 exceed thirty days after the last appeal is final.

2 DANIEL G. BOGDEN
3 United States Attorney

4 /s/ Kimberly M. Frayn
5 KIMBERLY M. FRAYN
6 Assistant United States Attorney

July 19, 2013

6 /s/ Shari Kaufman, Esq.
7 SHARI KAUFMAN, ESQ.
8 ASSISTANT FEDERAL PUBLIC DEFENDER
9 Counsel for defendant Paonessa

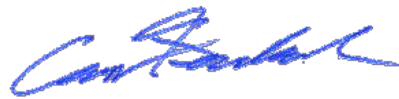
July 23, 2013

9 /s/ Chris Rasmussen, Esq.
10 CHRIS RASMUSSEN, ESQ.
11 Counsel for defendant Kroger

July 23, 2013

12 ORDER

13 IT IS SO ORDERED this 24th day of July
14 2013.

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17 United States Magistrate ~~Court~~ Judge
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